

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS

FILED
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS

2019 MAR 11 PM 2:05

SHERMAN DIVISION

CLERK U.S. BANKRUPTCY COURT
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In Re:) Case No. 18-41997

Feysal Ayati-Ghaffari,) Chapter 13

Debtor.) Honorable Judge Brenda T. Rhoades

DEBTOR'S OBJECTION TO MOTION TO WITHDRAW AS ATTORNEY OF RECORD Dkt.38

Debtor Feysal Ayati-Ghaffari objects to this seven years nonowner Chase Bank Foot-Dragging unrecognized nonreal party in interest cause of action has been explained to the Allmand Lawfirm very well before signing the agreement and in support shows the following:

1. Debtor Feysal Ayati-Ghaffari on 09/04/2018 filed a *pro se* voluntary Chapter 13 of title 11.
2. on about 10/05/2018 parties agreed that the Allmand lawfirm take care of bankruptcy case and bankruptcy appeal, and not the live civil portion. We are not able to cater unrecognized creditor until Chase Bank come forward with the foreclosure bankruptcy law requirement of existing proof of ownership before 07/05/2013 foreclosure action; "Certified unbroken chain of title from Freedom Mortgage corporation to Chase Bank securitization audit" before their debt-validation get approved or it's deemed to be unopposed dismissal. This court must stop foot-dragging, the Dkt.32 nothing but foot dragging in proceeding of civil action (fraud on the court) which has no shred of proof of ownership so this court and the Allmond Lawfirm be able to function accordingly within the scope of the Real Party in Interest according to the bankruptcy debt-validation Law. The deed of trust was not validly executed & debtor is not in default under the original note.

3. The proof of claim at issue facially defective, that does eradicate the debt as to When & How they came to acquire ownership of the mortgage note from Freedom Mortgage Corporation before the 7/5/2013 foreclosure action, Dkt.32 did not provide any evidence that Chase bank has the authority to bring the claim as Fed. R. Bankruptcy P. 3001(c), Creditor does not exist because the bank has not Validated its Debt, and the debt is split with the note floating around, and the Trustor cannot pay the debt because of who may actually collect the debt (Multi-Claim) is the counselor problem who hesitate to go forward, which the court is forced and has a duty to establish that whom is the "Real Party in Interest" adhere to the principals of Law, if bank cannot provide it owns the mortgage note the improper foreclosure cannot proceed, and they must be removed from the property title, regardless of whether the debt has been discharged.

4. Bank Failed to join and attach sufficient documentation to prove that a debt is owed by providing the Copy of the valid-written contractual agreement between the parties which does not exist to be enforceable or it's subject to the statutes of fraud. Fraud on the U.S. Judicial Court Systems. A party necessary to the adjudication of this suit is absent.

WHEREFORE, PREMISES CONSIDERED, debtor prays that the court does not allow Movant to withdraw as counsel of record for Debtor, since he is not behind payment, and just.

Dated March 06, 2019.

Respectfully submitted,
Creditor does not exist as record Debtor objection sent to Allmand Law to efile & notify all.

/ Ghaffari /
Feysal Ayati-Ghaffari
2301 All Saints Lane
Plano, Texas 75025
(972)527-1234

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 06th March 2019, a true & correct copy of the foregoing document was served, via fax (214)265-1979 Weldon Reed Allmand 860 Airport Freeway, suite 401 Hurst, Texas 76054.

/ Ghaffari /
Feysal Ayati-Ghaffari